

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF
PENNSYLVANIA (Philadelphia)**

In Re:

CHAPTER 13

**TANYA L CAIN
AKA TANYA L
CHAMBERS-CAIN
TIMOTHY D CAIN**

BK NO. 17-16840-amc

Debtor

_____ /

**SUPPLEMENTAL DECLARATION IN SUPPORT
OF MOTION FOR RELIEF FOR AUTOMATIC
STAY**

I, Gina Miner, declare under penalty of perjury as follows:

1. I am an authorized signor for CITIMORTGAGE, INC., (“Movant”). This supplemental declaration is provided in support of the Motion for Relief from Stay (the “Motion”) filed contemporaneously herewith.
2. As part of my job responsibilities for Movant, I have personal knowledge of the business records and I am familiar with the types of records maintained by Movant in connection with the loan that is the subject of the Motion (the “Loan”) and the procedures for creating those types of records. I have access to and have reviewed the books, records and files of Movant that pertain to the Loan and extensions of credit given to Debtor(s) concerning the property securing such Loan.
3. The information in this declaration is taken from Movant’s business records regarding the Loan. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of Movant’s regularly conducted business activities; and (c) it is the regular practice of Movant to make such records.

4. The Debtors, TANYA L CAIN AKA TANYA L CHAMBERS-CAIN AKA TANYA CAIN and TIMOTHY D CAIN, have executed and delivered or are otherwise obligated with respect to that certain promissory note referenced in the Motion (the "Note"). Pursuant to that certain Mortgage referenced in the Motion (the "Mortgage"), all obligations of the Debtor under and with respect to the Note and the Mortgage are secured by the property referenced in the Motion.

5. As of August 18, 2020, there are one or more defaults in paying Debtor's post-petition amounts due with respect to the Note.

6. As of August 18, 2020, the unpaid principal balance of the Note is \$105,472.64.

7. The following chart sets forth those post-petition payments, due pursuant to the terms of the note, that have been missed by the Debtors as of August 18, 2020:

Number of Missed Payments	From	To	Missed Principal and Interest	Missed Escrow (if applicable)	Monthly Payment Amount	Total Amounts Missed
4	05/01/2020	08/01/2020	\$524.01	\$471.88	\$995.89	\$3,983.56

Less post-petition partial payments (suspense balance): \$26.96

Total: \$3,956.60

8. As of August 18, 2020, the total post-petition arrearage/delinquency is \$3,956.60, consisting of (i) the foregoing total of missed post-petition payments in the amount of \$3,956.60, plus (ii) the following post-petition fees¹:

¹ The total of missed postpetition payments for this escrow loan include any missed escrow payments. Such missed escrow payments include amounts assessed for taxes and insurance and any previously assessed escrow shortage amount (if applicable). To avoid duplication, postpetition advances (if any) made for insurance, real estate taxes, or similar charges are not listed separately to the extent such advances would have been paid from the missed escrow payments. As part of the next annual RESPA analysis, movant will determine whether the escrow payment assessed to the debtor(including the missed escrow payments) result in a projected escrow shortage or overage. All rights are hereby reserved to assert or request any escrow amounts in accordance with RESPA and the total postpetition arrearage/delinquency is qualified accordingly.

Description	Amount
n/a	\$0.00

9. Attached hereto as Exhibit A is a post-petition payment history.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28th day of August, 2020.

/s/ Gina Miner
Printed name Gina Miner
Title: Vice President – Document Execution
Date: 8/28/20